

Lisa Morgan

Subject: FW: Depositions of Ms. Aufdem-Brinke, Mr. Thaggard and Mr. Skinner

From: Adam Greivell <adam@greivelllawoffice.com>

Sent: Wednesday, June 7, 2023 9:20 AM

To: Yosef Kuperman <ykuperman@frankdailylaw.com>; Lisa Morgan <lmorgan@frankdailylaw.com>

Cc: "Schaufelberger, Nicholas A." <nschaufelberger@tthlaw.com>; Frank Daily <info@frankdailylaw.com>; Sharon Petillo <spetillo@frankdailylaw.com>; Sherrie Fleetwood <sfleetwood@frankdailylaw.com>; Denise Kochanek <dkochanek@frankdailylaw.com>

Subject: RE: Depositions of Ms. Aufdem-Brinke, Mr. Thaggard and Mr. Skinner

Hi Ms. Morgan -

I will respond to your requests one at a time.

1. "copies of all pleadings, scheduling notices, court orders, and other papers previously filed in the action that should have been served with the Amended Complaint"
 - a. I painstakingly assembled all of these documents and provided them to my process server, who served an entire paper copy of each and every one of those documents (which are also itemized on the attached Pleadings List) on each of your three clients. Therefore, you should have three copies of each of the documents requested already. After the papers went out for service, as Mr. Schaufelberger already advised, the parties filed the attached Joint Motion to Vacate Scheduling Order, Court granted the Motion via the also attached Order. Those papers your clients were served with, combined with the Motion and Order attached, are all the papers filed in the case before your clients were served.
2. "names of any witnesses that have been deposed in this matter and the court reporters utilized for those depositions."
 - a. Daniel Aufdem-Brinke as the Corporate Designee of CharDan, LLC - Jackie Smith,
 - b. Hon. Joseph Michael - Planet Depos
 - c. Neal Glessner - Planet Depos
3. Additional Deposition of Neal Glessner
 - a. Since Mr. Glessner already gave a deposition, either universal consent or leave of court needs to be obtained before requiring a second. I am open (but not committed as of yet) to consider consenting if we can get on the same page that we're not going to cover ground that has already been covered.

I am going to go ahead and pencil in:

June 28 9am for Thaggard

June 28 11am for Skinner

June 29 9am for Charlotte

I'm going to do these in person at my office, address listed below. If you have specific conflicts or objections to these dates, please let me know by Friday.

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